From: (b) (6)

Sent: Wednesday, September 07, 2016 12:52 AM

To: HarborComments

Subject: University Park Neighborhood Association Comments on Portland

Harbor Superfund Cleanup

Attachments: UPNA Comments to EPA on Portland Harbor Superfund Cleanup.doc

Please find the attached comments approved by the University Park Neighborhood Association (UPNA) Board.

EPA, Region 10

Portland Harbor Superfund Comments from the University Park Neighborhood Association

The University Park Neighborhood has over 8,000 residents and includes the University of Portland. It has a long history and evolution with the Willamette River that comprises its southern border. Members of the Lewis and Clark Expedition climbed the bluff overlooking the Willamette River near or on the University's campus. Since then the river has provided thousands of jobs for University Park residents. Hundreds of current residents use the river for recreational swimming, boating, bird watching, and fishing. Dozens of residents regularly consume the fish they catch in the Willamette River.

The UPNA Board is particularly concerned that the Willamette River be fully cleaned up so that it can be an asset for economic development; recreation; environmental sustainability; healthy ecosystems, flora and fauna; and healthy nutrition.

The UPNA Board notes that most of the proposed areas for dredging and capping are adjacent to the neighborhood such as the Swan Island channel. Our health and welfare are directly impacted by the EPA's choices made to restore the river environment. Our exposure exceeds the average two year river toxin exposure postulated on page 17 of the EPA cleanup proposal.

The UPNA Board requests:

- 1) that the EPA and dredging /capping contractors meet with the neighborhood prior to the commencement of the work so that local concerns can be addressed.
 - 2. the dredging be done in a manner that reduces environmental pollution, noise, and traffic within the neighborhood;
 - 3. the air pollution of dredging operations and the air-borne release of chemicals such as PCPs be monitored and recorded emission levels be publicly available
 - 4. the EPA should work with the University of Portland which has created specific models of the air currents along the Willamette River and Willamette Bluff.
 - 5. The water and riverbed of the Swan Island channel and along the river's northern bank to the railroad bridge be cleaned up to a level that fish caught in that stretch of the river be able to be eaten.
 - 6. Alternative G is the UPNA Board's preferred alternative. It removes more pollutants and better assures that the river is cleaned up to protect the health of University Park Neighborhood residents.
 - 7. The UPNA Board opposes the proposed CDF at Terminal 4.
 - 8. The EPA should maintain oversight and responsibility for this Superfund Cleanup and not delegate authority to the Oregon DEQ.
 - 9. Monitored recovery requires more than signage and fencing along the riverbed, but regular enforcement.
 - 10. The UPNA Board supports the comments and recommendations of the PHCAG.

The University Park Neighborhood Association Board supports Alternative G and all enhancements that restore an unconditionally clean and healthy river to all of Portland.

Respectfully,		
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